

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
GERRELL BUTLER	:	VIOLATION:
LACRETIA BAILEY	:	18 U.S.C. § 371 (conspiracy to
	:	manufacture counterfeit
	:	currency - 1 count)
	:	18 U.S.C. § 471 (manufacturing
	:	counterfeit currency - 1 count)
	:	18 U.S.C. § 472 (possessing and
	:	passing counterfeit currency - 2 counts)
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From in or about the summer of 2006 to on or about January 4, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendants

GERRELL BUTLER and
LACRETIA BAILEY

conspired and agreed together to commit offenses against the United States, that is, to knowingly and with intent to defraud manufacture counterfeit United States currency, in violation of Title 18, United States Code, Section 471.

MANNER AND MEANS

2. It was part of the conspiracy that defendant GERRELL BUTLER obtained a printer on which to manufacture counterfeit United States currency.

It was further part of the conspiracy that:

3. Defendants GERRELL BUTLER and LACRETIA BAILEY manufactured the currency in the living room of BAILEY's apartment at 1516 Judson Way, Apt. 1201, Philadelphia, Pennsylvania.

4. Defendant LACRETIA BAILEY purchased paper and ink cartridges for co-defendant GERRELL BUTLER so that he could print the counterfeit currency.

5. Defendant GERRELL BUTLER used the printer to copy the front and back of genuine currency onto blank paper.

OVERT ACTS

In furtherance of the conspiracy, defendants GERRELL BUTLER and LACRETIA BAILEY committed the following overt acts, among others, in the Eastern District of Pennsylvania:

1. On or about December 22, 2006, defendant GERRELL BUTLER distributed \$280 in counterfeit currency to a person known to the grand jury.

2. On or about January 4, 2007, defendant GERRELL BUTLER agreed to sell \$1000 in counterfeit currency to a person known to the grand jury in exchange for \$250 in genuine United States currency.

3. On or about January 4, 2007, defendant LACRETIA BAILEY purchased paper and three ink cartridges for defendant GERRELL BUTLER to manufacture counterfeit currency.

4. On or about January 4, 2007, defendant GERRELL BUTLER distributed \$1020 in counterfeit currency to a person known to the grand jury in exchange for \$250 in genuine United States currency.

5. On or about January 4, 2007, defendants GERRELL BUTLER and LACRETIA BAILEY possessed an additional \$1,937 in counterfeit currency at BAILEY's apartment.

6. On or about January 4, 2007, defendants GERRELL BUTLER and LACRETIA BAILEY possessed an additional \$4,506 in counterfeit currency at BAILEY's apartment that was one-sided and not yet been completed.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 4, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

GERRELL BUTLER

with intent to defraud, falsely made, forged, and counterfeited obligations and securities of the United States, that is, approximately \$2,957 in counterfeit \$100, \$20, \$10, \$5, and \$1 Federal Reserve Notes.

In violation of Title 18, United States Code, Section 471.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 4, 2007, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

GERRELL BUTLER

with intent to defraud, possessed and passed falsely made, forged, and counterfeited obligations
of the United States, that is, \$1,020 in counterfeit \$10 Federal Reserve Notes.

In violation of Title 18, United States Code, Section 472.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 4, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**GERRELL BUTLER and
LACRETIA BAILEY**

with intent to defraud, possessed and concealed, and aided and abetted the possession and concealment of, falsely made, forged, and counterfeited obligations of the United States, that is, \$1,937 in counterfeit \$100, \$20, \$10, \$5, and \$1 Federal Reserve Notes.

In violation of Title 18, United States Code, Sections 472 and 2.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney